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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

-against
BRIAN N. LINES, et al.,

Defendants.

PLEASE TAKE NOTICE that, upon the accompanying Moving Defendants' Memorandum of Law in Support Their Motion for the Issuance of Letters of Request to Foreign Courts and the exhibit thereto, defendants LOM (Holdings) Ltd., Lines Overseas Management Ltd., LOM Capital Ltd., LOM Securities (Bermuda) LTD., LOM Securities (Cayman) Ltd., LOM Securities (Bahamas) Ltd., defendant Brian N. Lines, and defendant Scott G. S. Lines, (collectively, the "Moving Defendants"), will move this Court, at a date and time as the court shall designate, pursuant to Federal Rule of Civil Procedure 28(b), for the issuance of Letters of Request to courts in Alberta, Ontario and British Columbia, and the United Kingdom, to request that those courts compel the attendance of witnesses within the jurisdiction of those courts to be

questioned for use of their testimony at trial, and to produce documents specified in the Letters of Request.

PLEASE TAKE FURTHER NOTICE, that [this Motion is not opposed by any party].

Dated: August 20, 2008

DATED: New York, New York August 20, 2007

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